

From: Martin, Karen <Karen.Martin@pepperdine.edu>
Sent: Monday, May 16, 2011 11:37 PM
To: Crystal Spurr
Subject: Comments on the Broad Beach sand replenishment plan

Date: May 16, 2011

To: Crystal Spurr, Staff Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825
email: Crystal.Spurr@slc.ca.gov
Ms. Spurr,

Thank you for the opportunity to comment on the Broad Beach Restoration Project.

Here are my concerns with this plan.

- 1) None of the proposed alternatives addresses getting rid of the septic systems to avoid additional problems.
- 2) None of the proposed alternatives proposes getting rid of the current "temporary" revetment. It has not been demonstrated that a hardscape below one long, continuous dune will replicate natural sand movements or sand stability.
- 3) Every alternative, but particularly those that include offshore sand bars, should be evaluated for their effects on the surf.
- 4) Repeated replenishments, particularly at high frequencies, are likely to have negative impacts on beach invertebrates, birds, and grunion spawning habitat.
- 5) An EIR for additional work should address the impacts of the previous emergency and non-permitted actions of the homeowners and TPOA that may have contributed to the current state of the system.
- 6) The potential effects of increased sand transport to downcoast areas should be examined.

The following concerns relate to information in the proposal.

- 1) Because of the suggestion that this work will lead to increased public access, the plan should state clearly where the public would be allowed on a widened beach. In past years, the public has been effectively restricted to the area below the mean high tide line on this beach.
- 2) How will the Directors be chosen for the GHAD and what expertise will they offer? Will they also be members of the TPOA? Will this affect the previous pledge to use only private funds for sand replenishment?

- Thank you for your efforts on this project.

Sincerely,

Karen Martin, Ph.D.
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Research Associate, Scripps Institution of Oceanography